

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MATTHEW & MONICA DAWKINS,**

*Plaintiffs,*

**v.**

**ALLSTATE VEHICLE & PROPERTY  
INSURANCE COMPANY,**

*Defendant.*

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**CIVIL ACTION NO. 4:24-CV-00639**

**DECLARATION OF RICHARD BRANDON GADROW**

I, Richard Brandon Gadrow, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am Richard Brandon Gadrow, the son of Richard A. Gadrow who passed away on June 2, 2023. I have been involved in the professional estimating business alongside my father since 2014, working at Quantum Claim Consulting Services located at 30718 Meadow Edge Dr., Magnolia, TX 77354.
2. Throughout our business practice, both my father and I used the professional signature "RICK.QCC" on our estimates. This was and continues to be our standard business practice. I have maintained this signature convention after my father's passing, as I continue to operate our family business. Every estimate written by Quantum Claims and Consulting uses that same standard signature because it is the operating name on the company Xactimate account.
3. I am an experienced estimator and claim consultant. I learned the business working directly with my father for 9 plus years before his passing. I have personally handled hundreds of estimates and inspections, including numerous amount for Allstate Insurance Company since June 2023.
4. I personally performed the inspection and prepared the estimate dated October 26, 2023, for claim number DICKLAW-23269HOU. As with all my estimates, I signed it with "RICK.QCC" in accordance with our standard business practice.
5. I executed the affidavit dated April 25, 2024, in this matter. The affidavit was properly notarized by Louis Charles Taylor Jr. after verification of my identity.
6. I continue to operate Quantum Claim Consulting Services from the same location and using the same professional practices established during my years working with my father.

Allstate Insurance Company has regularly accepted my estimates that were submitted to them since the date of my fathers passing on June 2<sup>nd</sup> of 2023, and even before.

7. Any suggestion that my estimates or affidavits were submitted under false pretenses or represent "throwdown" documents is categorically false. I have maintained our legitimate family business practice with the highest professional standards.

8. I cannot recall ever telling anyone that I explicitly go by Brandon and not Richard. Richard is my first name, it appears that way on all legal documents involving me, on my license, bank etc. People close to me call me Brandon, people that are not so close mostly call me Richard, both are correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. See 28 U.S.C. § 1746.

Executed on 2/21/2025, at Houston, Texas

  
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RICHARD BRANDON GADROW